

EXHIBIT 15

Lisa Parisi

June 16, 2014

Atlanta, GA

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3
4 H. CRISTINA CHEN-OSTER;)
5 LISA PARISI; and SHANNA)
6 ORLICH,)
7 Plaintiffs,) 10 Civ. 6950 (AT) (JCF)
8 vs.)
9 GOLDMAN, SACHS & CO. and)
10 THE GOLDMAN SACHS GROUP,)
11 INC.,)
12 Defendants.)

13

14 VIDEOTAPED DEPOSITION OF
15 LISA PARISI

16

17 June 16, 2014

18 9:07 a.m.

19

20 Suite 100

21 1170 Peachtree Street, N.E.

22 Atlanta, Georgia

23

24 Reported by:

25 F. Renee Finkley, RPR, RMR, CRR, CLR, CCR-B-2289

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<p>1 consistent.</p> <p>2 Q. When you said you and [REDACTED] were</p> <p>3 hired to run the small cap product, wasn't [REDACTED]</p> <p>4 hired at Goldman before you joined?</p> <p>5 A. Yes.</p> <p>6 Q. And when you joined the firm, he was</p> <p>7 already running small cap, correct?</p> <p>8 A. That's correct.</p> <p>9 Q. Was he your manager at that point?</p> <p>10 A. He was not my manager. He was more senior</p> <p>11 than I was, but we were both responsible for the</p> <p>12 performance of small cap.</p> <p>13 Q. And you mentioned that during the course</p> <p>14 of your career, the sectors changed that you had</p> <p>15 covered?</p> <p>16 A. As we -- the team grew, the sectors</p> <p>17 changed. So the more we were able to give some of</p> <p>18 the analysts, as they got more experienced, we were</p> <p>19 able to give them some of the sectors. As we were</p> <p>20 able to hire some other portfolio managers, we were</p> <p>21 able to give them some of the sectors.</p> <p>22 Q. Do you recall any sector that you were</p> <p>23 covering that was subsequently given to an analyst to</p> <p>24 cover?</p> <p>25 MS. GREENE: Objection.</p>	<p>1 A. Someone wasn't performing well in that</p> <p>2 sector.</p> <p>3 Q. Anything else?</p> <p>4 A. Alleviate workload.</p> <p>5 Q. And when you testified earlier in response</p> <p>6 to my question as to who made the decisions to change</p> <p>7 the sectors, when you said we all did, that included</p> <p>8 you?</p> <p>9 A. Yes.</p> <p>10 Q. And would it be fair to say, based upon</p> <p>11 your previous testimony, that those reasons for</p> <p>12 changing coverage for the sectors were not</p> <p>13 discriminatory, correct?</p> <p>14 MS. GREENE: Objection.</p> <p>15 THE WITNESS: I'm not sure what you mean</p> <p>16 by that.</p> <p>17 Q. (By Ms. Han) Well, if somebody is not</p> <p>18 performing well in a particular sector or coverage is</p> <p>19 changed to alleviate workload, those reasons are not</p> <p>20 due to an individual's gender, correct?</p> <p>21 MS. GREENE: Objection.</p> <p>22 THE WITNESS: No.</p> <p>23 Q. (By Ms. Han) You testified earlier that</p> <p>24 you reported to Ms. [REDACTED] correct?</p> <p>25 A. Correct.</p>
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<p>1 THE WITNESS: I don't recall them exactly.</p> <p>2 Q. (By Ms. Han) But your recollection is</p> <p>3 that within the group, from time to time, sectors</p> <p>4 would be reassigned for a variety of reasons,</p> <p>5 correct?</p> <p>6 A. Yes, and because [REDACTED] was there first, he</p> <p>7 had the bulk of the sectors, so most of the sectors</p> <p>8 were coming from him, he was able to give most of the</p> <p>9 sectors to the new hires.</p> <p>10 Q. So [REDACTED] would at one point have X</p> <p>11 number of sectors, but the coverage would change and</p> <p>12 he might have given certain sector to another</p> <p>13 individual?</p> <p>14 MS. GREENE: Objection.</p> <p>15 THE WITNESS: Yes.</p> <p>16 Q. (By Ms. Han) And who made the decision as</p> <p>17 to whether coverage for sectors should change?</p> <p>18 A. We all did.</p> <p>19 Q. And you mentioned one of the reasons for</p> <p>20 changing the sectors included providing a more junior</p> <p>21 employee an opportunity to take on more</p> <p>22 responsibility?</p> <p>23 A. There were a number of different reasons</p> <p>24 why we changed sectors.</p> <p>25 Q. What's another reason?</p>	<p>1 Q. And did you report to her during your</p> <p>2 entire tenure at Goldman, Sachs?</p> <p>3 A. Yes.</p> <p>4 Q. And did you understand that Ms. [REDACTED]</p> <p>5 was primarily responsible for determining your</p> <p>6 compensation?</p> <p>7 A. Yes.</p> <p>8 Q. Did you also understand that Ms. [REDACTED]</p> <p>9 was primarily responsible for determining your</p> <p>10 manager quartile?</p> <p>11 A. Yes.</p> <p>12 MS. GREENE: Objection.</p> <p>13 Q. (By Ms. Han) And Ms. [REDACTED] is a woman,</p> <p>14 correct?</p> <p>15 A. As far as I know.</p> <p>16 Q. You testified earlier that you have</p> <p>17 enormous respect for [REDACTED], correct?</p> <p>18 A. That's right.</p> <p>19 Q. Did you believe that at any point in time</p> <p>20 while you were employed at Goldman, Sachs, he</p> <p>21 discriminated against you on the basis of your</p> <p>22 gender?</p> <p>23 A. Pertaining to what?</p> <p>24 Q. Any terms of your employment.</p> <p>25 A. As far as compensation?</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. (By Ms. Han) Why not?</p> <p>2 A. Because they -- maybe they varied. They</p> <p>3 probably leaned towards working less with me.</p> <p>4 Q. And can you think of any specific examples</p> <p>5 of an individual you thought should not have reviewed</p> <p>6 you?</p> <p>7 A. I won't say not. I think just generally</p> <p>8 the quality of the list was diminished.</p> <p>9 Q. But you don't remember any specific</p> <p>10 individuals?</p> <p>11 A. It was a while ago.</p> <p>12 Q. Do you recall any individuals you believe</p> <p>13 should have been included in your reviewer list?</p> <p>14 A. It was a while ago. I don't.</p> <p>15 Q. Did you have the opportunity to discuss</p> <p>16 with Ms. [REDACTED] your views as to who should be on</p> <p>17 the reviewer list?</p> <p>18 A. No.</p> <p>19 Q. So describe the process.</p> <p>20 A. I would put a list together; it would go</p> <p>21 to her, she would change it, and it was sent out to</p> <p>22 those individuals.</p> <p>23 Q. How did you know it was changed?</p> <p>24 A. Because I would see who sent back reviews.</p> <p>25 I wouldn't get the exact reviews, but I'd get</p>	<p style="text-align: right;">Page 48</p> <p>1 included some women, I wouldn't say many women.</p> <p>2 And even if it did include women, they may not</p> <p>3 have known me as well as some other people that</p> <p>4 were originally on the list that could evaluate</p> <p>5 me better.</p> <p>6 Q. (By Ms. Han) Just to clarify, the basis</p> <p>7 for your statement that you believe Ms. [REDACTED]</p> <p>8 discriminated against you with respect to your</p> <p>9 reviewer list, is that you believe other men in your</p> <p>10 group did not have the reviewer list changed?</p> <p>11 MS. GREENE: Objection.</p> <p>12 THE WITNESS: As to the extent that mine</p> <p>13 was.</p> <p>14 Q. (By Ms. Han) How do you know whether and</p> <p>15 to what extent other men in your group had the</p> <p>16 reviewer list changed or not changed?</p> <p>17 A. By discussing it, asking.</p> <p>18 Q. Who did you discuss it with?</p> <p>19 A. Just generally, when we went upstairs to</p> <p>20 have lunch, I would just ask a number of different</p> <p>21 people over the years. I don't remember exactly what</p> <p>22 years, who I asked.</p> <p>23 Q. Well, can you think of any specific male</p> <p>24 employee you had this discussion with?</p> <p>25 A. I think I probably asked most of them.</p>
<p style="text-align: right;">Page 47</p> <p>1 checkmarks of who submitted a review for me.</p> <p>2 Q. And did you have an understanding as to</p> <p>3 why Ms. [REDACTED], as you claim, changed your reviewer</p> <p>4 list?</p> <p>5 A. I'm not claiming she did. I know she did.</p> <p>6 No, I did not have an understanding of that.</p> <p>7 Q. Do you believe that she changed the</p> <p>8 reviewer list to discriminate against you?</p> <p>9 A. I never felt that it was in my favor.</p> <p>10 Q. I understand, but the question is whether</p> <p>11 you felt Ms. [REDACTED] changed your reviewer list in</p> <p>12 an effort to discriminate against you on the basis of</p> <p>13 your gender?</p> <p>14 MS. GREENE: Objection. You can answer.</p> <p>15 THE WITNESS: I would say yes.</p> <p>16 Q. (By Ms. Han) And what is the basis for</p> <p>17 that statement?</p> <p>18 A. If it wasn't in my favor, and I felt like</p> <p>19 I was being singled out and the other men in my</p> <p>20 department weren't being singled out like that, then</p> <p>21 I would have to say yes, it was based on my gender.</p> <p>22 Q. Would it be fair to say, though, that your</p> <p>23 reviewer list included many women?</p> <p>24 MS. GREENE: Objection.</p> <p>25 THE WITNESS: It didn't include -- it</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Can you provide some names?</p> <p>2 A. Probably [REDACTED], [REDACTED], [REDACTED]</p> <p>3 [REDACTED], [REDACTED]; I know I'm forgetting a couple.</p> <p>4 [REDACTED]</p> <p>5 Q. And it's your testimony that these men</p> <p>6 told you that they had no changes to --</p> <p>7 (Discussion off the record.)</p> <p>8 Q. (By Ms. Han) Is it your testimony that</p> <p>9 all these men, [REDACTED] -- I think you mentioned [REDACTED]</p> <p>10 [REDACTED], [REDACTED], [REDACTED], and [REDACTED] all</p> <p>11 told you that they did not have any changes to the</p> <p>12 reviewer list?</p> <p>13 MS. GREENE: Objection.</p> <p>14 THE WITNESS: I did not say that.</p> <p>15 Q. (By Ms. Han) So what did you --</p> <p>16 A. I said their changes weren't to the extent</p> <p>17 of mine.</p> <p>18 Q. But you don't know the nature of the</p> <p>19 specific relationships that these individuals had</p> <p>20 with their reviewers, correct?</p> <p>21 MS. GREENE: Objection.</p> <p>22 THE WITNESS: We did not discuss the exact</p> <p>23 names on the list. We discussed changes, the</p> <p>24 number of changes on the list.</p> <p>25 Q. (By Ms. Han) So you did not talk about</p>

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<p>1 this case. It's an uncomfortable complaint.</p> <p>2 Q. I'm sorry. When you said just read the</p> <p>3 comments that came out after this case, what are you</p> <p>4 referring to?</p> <p>5 A. Men don't take comments like that very</p> <p>6 lightly.</p> <p>7 Q. I'm sorry. What comments are you</p> <p>8 referring to?</p> <p>9 A. That we're discriminated against. That</p> <p>10 women are discriminated against and that's why we</p> <p>11 make less money and are treated -- or given less</p> <p>12 opportunities.</p> <p>13 Q. So your statement that women at Goldman,</p> <p>14 Sachs are unwilling to make complaints is based on</p> <p>15 your view that alleging gender discrimination is a</p> <p>16 difficult thing to do?</p> <p>17 A. Yes.</p> <p>18 Q. Anything else?</p> <p>19 A. No.</p> <p>20 Q. Your next statement, I also believe that</p> <p>21 only a small fraction of the women who suffered sex</p> <p>22 discrimination and bias as Goldman have come forward</p> <p>23 to complain due to the risk of retaliation, what is</p> <p>24 the basis of that statement?</p> <p>25 A. As I said, I think it's a difficult thing</p>	<p>1 Q. (By Ms. Han) Well, maybe you can answer</p> <p>2 it again.</p> <p>3 A. Well, you've asked me at different levels,</p> <p>4 so I don't know where you want me to answer that.</p> <p>5 Did I go to HR? No. Did I express some concern</p> <p>6 when -- at compensation time? Yes.</p> <p>7 Q. So just so the record's clear, you</p> <p>8 testified that at no point during your career at</p> <p>9 Goldman, Sachs did you ever utilize the complaints</p> <p>10 procedure referred to earlier in Goldman's Equal</p> <p>11 Employment Opportunity policy, correct?</p> <p>12 MS. GREENE: Objection.</p> <p>13 THE WITNESS: Correct.</p> <p>14 Q. (By Ms. Han) And you never went to</p> <p>15 employee relations, for example, or the legal</p> <p>16 department claiming gender discrimination, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And the one instance in which you claim</p> <p>19 you raised your concern about compensation to</p> <p>20 Ms. [REDACTED] you did not mention your belief that</p> <p>21 you were being discriminated against on the basis of</p> <p>22 your gender, correct?</p> <p>23 A. The time I raised concern to Ms. [REDACTED]</p> <p>24 was when I asked her if Goldman, Sachs -- she</p> <p>25 believed Goldman, Sachs had a culture of</p>
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<p>1 to bring forward. I think it has a lot of</p> <p>2 repercussions.</p> <p>3 Q. And again, that's based upon your</p> <p>4 perception that the nature of an allegation of gender</p> <p>5 discrimination is something difficult to discuss?</p> <p>6 A. In an industry, a business that is</p> <p>7 dominated with men, I think it's extremely -- a</p> <p>8 difficult -- a difficult claim to come forward with.</p> <p>9 Q. But you never personally raised any claims</p> <p>10 of gender discrimination?</p> <p>11 A. I think --</p> <p>12 MS. GREENE: Objection.</p> <p>13 THE WITNESS: It's a difficult claim.</p> <p>14 Q. (By Ms. Han) I'm sorry?</p> <p>15 A. As I said, I think it's a difficult claim</p> <p>16 to come forward with.</p> <p>17 Q. I'm asking whether you, Ms. Parisi, aside</p> <p>18 from this litigation, prior to this litigation, did</p> <p>19 you ever at any point in your career at Goldman,</p> <p>20 Sachs raise any concerns about gender discrimination?</p> <p>21 MS. GREENE: Objection.</p> <p>22 THE WITNESS: I think I've --</p> <p>23 MS. GREENE: Asked and answered.</p> <p>24 THE WITNESS: -- answered that in</p> <p>25 various -- at various points.</p>	<p>1 discriminating against women over men that are heads</p> <p>2 of households; I mentioned that conversation.</p> <p>3 Q. But did you when -- during that</p> <p>4 conversation with Ms. [REDACTED] did you say to</p> <p>5 Ms. [REDACTED] you believe you were being discriminated</p> <p>6 against with respect to compensation due to your</p> <p>7 gender?</p> <p>8 A. No, I did not.</p> <p>9 Q. Are you aware of any woman at Goldman,</p> <p>10 Sachs who did raise a complaint of gender</p> <p>11 discrimination who was retaliated against?</p> <p>12 A. No, I am not.</p> <p>13 Q. And when you say, when I brought the</p> <p>14 repeated instances of discrimination to the firm's</p> <p>15 attention, the firm did not act to remedy the</p> <p>16 situation, again, when you're talking about instances</p> <p>17 of discrimination, you're referring to compensation,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. Anything else?</p> <p>21 A. No.</p> <p>22 Q. Ms. Parisi, who wrote this declaration?</p> <p>23 MS. GREENE: Objection. Do you want to</p> <p>24 rephrase your question?</p> <p>25 Q. (By Ms. Han) Sure. I can rephrase it.</p>

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